

EXHIBIT 160

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

IN RE: PORK ANTITRUST
LITIGATION

Case Number:
0:18-cv-01776
JRT-HB

This document relates to
all actions.

Rule 30(b)(6) and Rule 30(b)(1)

Video Deposition of

SHAYLE D. SHAGAM

Wednesday, June 1, 2022

9:20 a.m.

Job No. 845663

Reported by: Laurie Donovan, RPR, CRR, CLR

1 BY MR. RISSMAN:

2 Q Well, let me ask my question again. Or
3 I'll just ask you -- and for the record, this is
4 as a 30(b)(6) witness.

5 What did you, what did you mean when you
6 said that you were aware of vertical integration
7 increasing over time? What does that mean?

8 A Well, we know that there's been an
9 increase in the number of hogs raised under
10 contract as opposed to raised by independent
11 producers. You know, we -- as was pointed out, I
12 mean the proportion of hogs bought by packers has
13 changed over time, but again, a lot of that was
14 looking at other studies done by say Jim MacDonald
15 at ERS on, on, on concentration in the various
16 industries.

17 Q And so what is -- so you mentioned hogs
18 raised under contract. In that scenario, can you
19 tell me what hogs raised under contract means?

20 MS. COTTRELL: Objection to form.

21 THE WITNESS: It would be, it would
22 be -- rather than, than an individual
23 producer going out and buying some pigs and,
24 you know, basically getting the corn, the
25 soybean meal, and then selling them to --

1 selling them at the time they were ready on
2 the spot market, there has been some sort of
3 agreement, either with a packer or some other
4 entity, that they would, that they would
5 raise a certain number of hogs at a certain
6 price.

7 You know, the nature of the
8 contracts will vary as to, you know, whether
9 they're buying their genetics or, you know,
10 what the company is supplying to them, and,
11 you know, whether that person is essentially
12 working, you know, selling their labor and
13 their facilities to the company, or whether
14 or not they are making their own production
15 decisions.

16 BY MR. RISSMAN:

17 Q Okay, and so, and so you would consider
18 hogs raised under contract in the scenario you
19 described to be part of a vertical integration; is
20 that right?

21 A Yes, I would.

22 Q And there would also be packer-owned; is
23 that right?

24 A That's correct.

25 Q And that would, that would be vertical

CERTIFICATE OF SHORTHAND REPORTER -- NOTARY PUBLIC

I, Laurie Donovan, Registered Professional Reporter, Certified Realtime Reporter, and notary public for the District of Columbia, the officer before whom the foregoing deposition was taken, do hereby certify that the foregoing transcript is a true and correct record of the testimony given; that said testimony was taken by me stenographically and thereafter reduced to typewriting under my supervision; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this 6th day of June 2022.

My commission expires: March 14, 2023



LAURIE DONOVAN
NOTARY PUBLIC IN AND FOR
THE DISTRICT OF COLUMBIA